

- a. Filing Fees - **\$250.00**
- b. Service of Process - **\$200.00**
Attached hereto as Exhibit "A," please find invoice from Mountain Support Services, Inc., reflecting the cost of service upon the Defendants.
- c. Investigative Fees-**\$350.00**
See Plaintiff's Affidavit

- d. Attorneys Fees - \$ 1350.00
See below

Total Litigation Expenses(\$2,150.00)

4. Attorney fees at \$200.00 per hour for attorney time spent and \$75.00 for paralegal time spent are as follows:

| | | | |
|--------------|---------------------------------|--------------|------------------------|
| 05/03/04 | Factual research | .5 | Atty |
| 05/04/04 | Claim letter | .50 | Para |
| 04/06/05 | Complaint Drafted | 1.0 | Atty |
| 04/13/05 | Arranged Service | .50 | Para |
| 07/26/05 | Review Proof of Service | .25 | Atty |
| 08/04/05 | Telephone call from Defendant | .25 | Atty |
| 08/05/05 | Review Proof of Service | .25 | Atty |
| 08/26/05 | Review of letter from Defendant | .25 | Atty |
| 08/29/05 | Review Proof of Service | .25 | Atty |
| 08/29/05 | File Proof of service | .50 | Para |
| 09/05/05 | Prepared Request for Default | 1.0 | Atty |
| 09/06/05 | Filed and mailed RFD | .50 | Para |
| 09/15/05 | Review Clerk's Certificate | .25 | Atty |
| 10/14/05 | Prepared Motion for Default | 2.0. | Atty |
| | | Hours | Fee |
| | | 6.0 | Atty \$1,200.00 |
| | | 2.0 | Para \$150.00 |
| TOTAL | | | \$1,350.00 |

15. The rate card for commercial establishments to legitimately purchase this event is attached as Exhibit "B."

16. We respectfully request that judgment be entered in favor of Plaintiff and against the Defendants in the manner stated herein.

WHEREFORE, your deponent respectfully requests that this Court in its discretion grant a permanent injunction and judgment by default under 605(a) on COUNT I of the Plaintiff's complaint against the Defendants jointly and severally as follows:

Against, JORGE MEJIA, Individually, and as officer, director, shareholder and/or principal of **CLUB CULTURAL LATINO AMERICANO, INC. d/b/a CLUB CULTURAL LATINO AMERICANO**

- 1) under 605(e)(3)(C)(i)(II) in the sum of up to TEN THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum of up to ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for Defendant's willful violation of 605(a)
- 3) and under 605(e)(3)(B)(iii) costs and Attorney fees of ONE THOUSAND SEVENTY-FIVE DOLLARS (\$1,075.00)

and further

Against. CLUB CULTURAL LATINO AMERICANO, INC. d/b/a CLUB CULTURAL LATINO AMERICANO

- 1) under 605(e)(3)(C)(i)(II) in the sum of up to TEN THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum of up to ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for increased damages for Defendant's willful violation of 605(a)
- 3) and under 605(e)(3)(B)(iii) costs and Attorney fees of ONE THOUSAND SEVENTY-FIVE DOLLARS (\$1,075.00)

Dated: November 16, 2005
Ellenville, NY 12428

By: /s/ Wayne D. Lonstein
Wayne D. Lonstein, Esq.
Bar Roll No. 629060
Attorney for Plaintiff
1 Terrace Hill, P.O. Box 351
Ellenville, NY 12428
Telephone: 845-647-8500 Sworn to
Facsimile: 845-647-6277
Our File No. 03-5MA-03G

before me this
day 16th day of November, 2005.

/s/ April Draganchuk
April Draganchuk
Notary Public State of New York
Registration No. 4945872
Residing in Ulster County
My Commission Expires Jan. 27, 2007

CLUB CULTURAL LATINO AMERICANO, INC. d/b/a CLUB CULTURAL LATINO AMERICANO

- 1) under 605(e)(3)(C)(i)(II) in the sum of_ TEN THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum of ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for increased damages for Defendant's willful violation of 605(a)
- 3) and under 605(e)(3)(B)(iii) costs and Attorney fees of ONE THOUSAND SEVENTY-FIVE DOLLARS (\$1,075.00))

Dated: September 22, 2005
Ellenville, NY 12428

By: /s/ Wayne D. Lonstein
Wayne D. Lonstein, Esq.
Bar Roll No. 629060
Attorney for Plaintiff
1 Terrace Hill, P.O. Box 351
Ellenville, NY 12428
Telephone: 845-647-8500
Facsimile: 845-647-6277
Our File No. 03-5MA-03G

1 Terrace Hill
P.O. Box 615
Ellenville, NY 12428

| Date | Invoice # |
|-----------|-----------|
| 8/29/2005 | 122 |

| Bill To |
|---|
| Lonstein Law Office, PC Wayne D Lonstein 1 Terrace Hill P.O. Box 351 Ellenville, NY 12428 |

| Description | Amount |
|--|--------|
| INDIVIDUAL SERVICE GCB v. JORGE MEJIA YOUR FILE #03-5MA-03G CV#05-10705 | 100.00 |
| CORPORATE SERVICE GCB v. CLUB CULTURAL LATINO YOUR FILE #03-5MA-03G CV#05-10705 | 100.00 |
| Total - \$200.00 | |

Exhibit B

www.boxingseries.com

GARDEN CITY BOXING CLUB

CHOICE OF CHAMPIONS

Closed Circuit Rate Card

"NIGHT OF CHAMPIONS!"

DE LA HOYA VS. CAMPAS

MORALES VS. VELARDEZ

MAY 3, 2003

| <u>SEATING</u> | <u>RATE</u> |
|-----------------------|--------------------|
| 1 – 50 | 1300.00 |
| 51 – 100 | 1800.00 |
| 101 – 200 | 2500.00 |
| 201 – 300 | 3500.00 |
| 301 – 400 | 4500.00 |
| 401 – 500 | 6000.00 |

This Rate Card is to be use by all distributors in the U. S territory for Commercial Establishments.

Any establishments with higher capacity or changes in capacity to be approve by Garden City Boxing Club Inc
Sales Manager Art Gallegos or President Joe Gagliardi

“Casinos Rate Card is \$25 per patron”

WE ACCEPT:

VISA, MASTERCARD, DISCOVER AND AMERICAN EXPRESS

TOLL FREE NUMBER: 1-888-258-7116

Art Gallegos
National Sales Manager